

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

2017 FEB 15 PM 4:31  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROSENDO HILARIO RODRIGUEZ-ESPINO  
aka "CHEF" aka "ROJO" (1)  
FRANCISCO MEDINA ALDACO (2)  
JESUS ANGEL MORENO (3)  
KIMBERLY BRETADO (4)

Defendants.

) CRIMINAL NO. SA-17-CR-00070-DAE

) **SUPERSEDING INDICTMENT**

) CT 1: 21:846 & 841(a)(1)-Conspiracy to  
) Possess a Controlled Substance with  
) Intent to Distribute (methamphetamine);  
) CT 2: 21:841(a)(1)-Possession with  
) Intent to Distribute a Controlled Substance;  
) (methamphetamine)  
) CT 3: 21:959(a),963,960(a)(3) & (b)(1)-  
) Extraterritorial distribution of narcotics  
) (methamphetamine);  
) CT 4: 21:841(a)(1)- Possession with  
) Intent to Distribute a Controlled Substance;  
) (methamphetamine)  
) CT 5: 18:924(c)- Possession of a Firearm  
) in furtherance of a Drug Trafficking Crime  
) CT 6: 21:841(a)(1) & 841(b)(1)(A)(ii)-  
) Possession with Intent to Distribute a  
) Controlled Substance (methamphetamine)  
) CT 7: 21:846 & 841(a)(1)-Conspiracy to  
) Possess a Controlled Substance With Intent  
) to Distribute (heroin)  
) CT 8: 21:841(a)(1) & 841(b)(1)(A)(i)  
) Possession with Intent to Distribute a  
) Controlled Substance (heroin)  
)

THE GRAND JURY CHARGES:

**COUNT ONE**

(21 U.S.C. §§ 846 & 841(a)(1) & 841(b)(1)(A)(viii))

That beginning on or about November 17, 2016, and continuing through and including  
the date of this indictment, in the Western District of Texas, Defendants,

ROSENDO HILARIO RODRIGUEZ-ESPINO aka "CHEF" aka "ROJO" (1)  
FRANCISCO MEDINA ALDACO (2)  
JESUS ANGEL MORENO (3)  
KIMBERLY BRETADO (4)

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with

others to the Grand Jury known and unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

**COUNT TWO**  
**(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)(viii))**

That on or about November 30, 2016, in the Western District of Texas, Defendants,

ROSENDO HILARIO RODRIGUEZ-ESPINO aka "CHEF" aka "ROJO" (1)  
FRANCISCO MEDINA ALDACO (2)

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

**COUNT THREE**  
**(21 U.S.C. §§ 959(a), 963, 960(a)(3) and (b)(1))**

Beginning on or about November 17, 2016 and continuing until on or about date of this Indictment in the Western District of Texas, the Republic of Mexico, and elsewhere, the Defendants,

ROSENDO HILARIO RODRIGUEZ-ESPINO aka "CHEF" aka "ROJO" (1)  
FRANCISCO MEDINA ALDACO (2)  
JESUS ANGEL MORENO (3)

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with each other, and with others to the Grand Jury unknown, to commit offenses against the

United States, in violation of Title 21, United States Code, Section 963, that is to say, they conspired to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, intending and knowing that said controlled substance would be unlawfully imported into the United States, in violation of Title 21, United States Code, Sections 959(a), 963, and 960(a)(3) and (b)(1).

**COUNT FOUR**  
**(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)(viii))**

That on or about November 9, 2016, in the Western District of Texas, Defendants,  
ROSENDO HILARIO RODRIGUEZ-ESPINO aka "CHEF" aka "ROJO" (1)  
JESUS ANGEL MORENO (3)  
knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

**COUNT FIVE**  
**(18 U.S.C. §§ 924(c)(1) and (2))**

Beginning on or about November 9, 2016, in the Western District of Texas, Defendant,  
JESUS ANGEL MORENO (3)  
did knowingly carry or use a firearm, that is a Smith and Wesson, model LCP, .9mm semi-automatic handgun Model SW9VE, serial #DYK1507, during and in relation to the drug trafficking crimes charged in Count One or Four of this Indictment, and did possess said firearm in furtherance of said drug trafficking crimes, re-alleged herein, contrary to Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT SIX**  
**(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)(viii))**

That on or about February 2, 2017, in the Western District of Texas, Defendants,

ROSENDO HILARIO RODRIGUEZ-ESPINO aka "CHEF" aka "ROJO" (1)  
KIMBERLY BRETADO (4)

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

**COUNT SEVEN**

(21 U.S.C. §§ 846 & 841(a)(1) & 841(b)(1)(A)(i))

That beginning on or about January 1, 2015, and continuing through and including the date of this indictment, in the Western District of Texas, the Northern District of Texas and elsewhere, Defendants,

ROSENDO HILARIO RODRIGUEZ-ESPINO aka "CHEF" aka "ROJO" (1)  
KIMBERLY BRETADO (4)

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed with others to the Grand Jury known and unknown, to commit offenses against the United States, in violation of Title 21, United States Code, Section 846, that is to say, they conspired to possess a controlled substance, which offense involved 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i).

**COUNT EIGHT**


(21 U.S.C. §§ 841(a)(1) & 841(b)(1)(A)(i))

That on or about May 24, 2015, in the Western District of Texas, Defendants,

KIMBERLY BRETADO (4)

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved one kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(i).

A TRUE BILL.

  
FOREPERSON OF THE GRAND JURY

RICHARD L. DURBIN, JR.  
UNITED STATES ATTORNEY

BY:

  
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RUSSELL D. LEACHMAN  
Assistant U.S. Attorney